

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/FM)
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This document relates to: Estate of John P. O'Neill, Sr., *et al.* v. Republic of Iraq, *et al.*, 04-CV-1076 (GBD)

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK       )  
  ) ss.:  
COUNTY OF NEW YORK    )

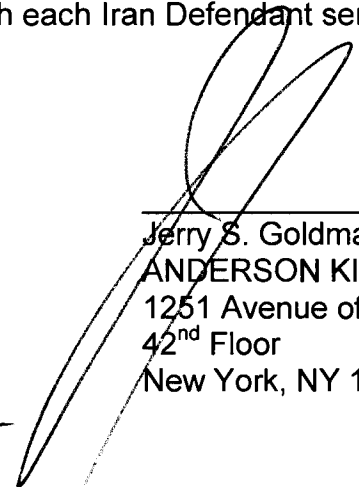
Jerry S. Goldman, being duly sworn, deposes and says:

1. I am an attorney admitted to practice in the above captioned matter, and a member of the law firm Anderson Kill P.C. I am familiar with the facts and circumstances in this action.
2. The O'Neill Plaintiffs' Summons(es), Complaint(s) and Notice(s) of Suit, and translations of each, filed in the above-captioned matter were served upon Defendants the Islamic Republic of Iran; Ali Fallahian, Iranian Minister of Intelligence and Security; Iranian Revolutionary Guard Corp.; Ayatollah Ali Hoseini-Khamenei; Mohammed Baqer Zolqadr, Iranian Revolutionary Guards Corp.; Iranian Revolutionary Guard Corp-Quds Force; and Iranian Ministry of Intelligence and Security (collectively, the "Iran Defendants").
3. Service on the Iran Defendants was effectuated pursuant to the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608 *et seq.* by sending Complaints, Summonses and Notices of Suit to J. Michael McMahon, Clerk of Court for the

Southern District of New York, who forwarded said documents to Mr. Edward Betancourt, Director of Special Consular Services for the United States Department of State (the "State Department"), by registered mail, return receipt requested. **Exhibit A** is a June 13, 2005 letter from Joshua M. Ambush, Esq. to J. Michael McMahon transmitting the relevant documents to the Clerk of the Court for submission to the State Department. **Exhibit B** contains true and correct copies of seven Clerk's Certificates of Mailing, showing delivery to the State Department in relation to each of the seven Iran Defendants.


4. The State Department served Iran Defendants with the assistance of the Foreign Interests Section of the Embassy of Switzerland in Tehran, Iran. The Foreign Interests Section delivered the relevant documents to the Iranian Ministry of Foreign Affairs under cover of diplomatic note. The documents were received on June 24, 2005. **Exhibit C** contains an excerpt from the 03-MD-1570 docket which indicates when the documents were received and which Certificate of Mailing corresponds with each Iran Defendant served.

Dated: October 31, 2014  
New York, NY



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Jerry S. Goldman, Esquire  
ANDERSON KILL P.C.  
1251 Avenue of the Americas  
42<sup>nd</sup> Floor  
New York, NY 10020

Sworn to before me this 31<sup>st</sup>  
Day of October, 2014.



MAXWELL NICHOLAS ROBERT  
Notary Public, State of New York  
No. 02MA6260669  
Qualified in King County  
Commission Expires April 30, 2016